

UNITED STATES DISTRICT COURT  
for the  
Central District of California

|  |   |
|--|---|
| HC3 Enterprises, LLC, a Texas Limited Liability<br>Company,  | ) |
|  | ) |
|  | ) |
|  | ) |
| <hr/> <i>Plaintiff(s)</i>  | ) |
|  | ) |
| DOMINATOR LLC, a California Limited Liability<br>Company; DOMINATOR INDUSTRIES, LLC, a<br>California Limited Liability Company; (See<br>attachment #1) | ) |
| <hr/> <i>Defendant(s)</i>  | ) |

Civil Action No. 8:24-cv-00327

**SUMMONS IN A CIVIL ACTION**

To: *(Defendant's name and address)* DOMINATOR LLC  
18047 Beach Blvd.  
Huntington Beach, California 92648  
DOMINATOR INDUSTRIES LLC  
18981 Crimson Cir.  
Huntington Beach, California 92646  
(See attachment #2)

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Marc E. Hankin  
HANKIN PATENT LAW, APC  
11414 Thurston Circle  
Los Angeles, CA 90049

[Marc@HankinPatentLaw.com](mailto:Marc@HankinPatentLaw.com)

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

*CLERK OF COURT*

Date: \_\_\_\_\_

*Signature of Clerk or Deputy Clerk*

Civil Action No. 8:24-cv-00327

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

I personally served the summons on the individual at *(place)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_; or

I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* \_\_\_\_\_, who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_; or

I returned the summons unexecuted because \_\_\_\_\_; or

Other *(specify)*:

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00 \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

1 MARC E. HANKIN (SBN: 170505)  
2 E-Mail: Marc@HankinPatentLaw.com  
ANOOJ PATEL (SBN: 300297)  
2 E-Mail: Anooj@HankinPatentLaw.com  
3 **HANKIN PATENT LAW,**  
4 A Professional Corporation  
11414 Thurston Circle  
Los Angeles, CA 90049  
5 Tel: (310) 979-3600/Fax: (310) 979-3603

6 Attorneys for PLAINTIFF,  
7 **HC3 Enterprises, LLC**

8  
9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 HC3 Enterprises, LLC, a Texas Limited  
12 Liability Company,

13 CASE No. 8:24-cv-00327

14 Plaintiff

15 v.

16 DOMINATOR LLC, a California  
17 Limited Liability Company;  
18 DOMINATOR INDUSTRIES, LLC, a  
19 California Limited Liability Company;  
DOMINATOR INDUSTRIES  
CYCLES LLC, a California Limited  
Liability Company; DOMINATOR  
TRUCKING LLC, a California Limited  
Liability Company; Thomas Tubbiola,  
an Individual; Michael Tubbiola, an  
Individual; and DOES 1-5;

20 Defendants.

21  
22 **COMPLAINT FOR TRADEMARK**  
23 **INFRINGEMENT AND UNFAIR**  
24 **COMPETITION**

25 **DEMAND FOR JURY TRIAL**

26  
27 **COMPLAINT FOR TRADEMARK INFRINGEMENT**  
28 **AND UNFAIR COMPETITION**

29 Plaintiff HC3 Enterprises, LLC dba Hill Country Custom Cycles (“HC3” or  
30 “Plaintiff”), for its Complaint for Trademark Infringement and Unfair Competition  
31 against Defendants DOMINATOR LLC (“Dominator”), DOMINATOR INDUSTRIES  
32 LLC (“Dominator Industries”), DOMINATOR INDUSTRIES CYCLES LLC  
33 (“Dominator Industries Cycles”), DOMINATOR TRUCKING LLC (“Dominator  
34 Trucking”), Thomas Tubbiola, and Michael Tubbiola (hereafter collectively  
35 “Defendants”), alleges as follows:

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

HC3 Enterprises, LLC v. DOMINATOR LLC et al  
Case No. 8:24-cv-00327

ATTACHMENT #2 TO SUMMONS

**DEFENDANTS TO BE SERVED:**

DOMINATOR LLC  
18047 Beach Blvd.  
Huntington Beach, California 92648

DOMINATOR INDUSTRIES LLC  
18981 Crimson Cir.  
Huntington Beach, California 92646

DOMINATOR INDUSTRIES CYCLES LLC  
19744 Beach Blvd., 378  
Huntington Beach, California 92648

DOMINATOR TRUCKING LLC  
19744 Beach Blvd, 378  
Huntington Beach, California 92648

Thomas Tubbiola  
18981 Crimson Cir.  
Huntington Beach, California 92646

Michael Tubbiola  
18981 Crimson Cir.  
Huntington Beach, California 92646